

4034 S.W. Hamilton St.
Portland, OR 97221
May 17, 1999
6 3 1 1 '99 MAY 24 P12:39

Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

To U. S. Food and Drug Administration:

Re: Docket No. 98N-1038, Irradiation in the Production, Processing, and Handling of Food:

I have been made aware that, currently, any food treated with radiation during the production process is labeled with a symbol known as a radura (the international symbol for irradiated foods) and either a statement saying "treated with radiation" or "treated by irradiation", and I learned that a proposed rule before the FDA would allow manufacturers to sell any irradiated foods to the consumer without mentioning the use of radiation during processing. This is bad for all of us.

The FDA has determined that radiation is safe for food, but I and many more consumers do not want to eat foods treated with radiation for reasons including the following:

Over 550 new facilities would need to be built to irradiate various foodstuffs if irradiation expands to according to industry projections.

Food irradiation facilities have a frightening record of accidents and other safety incidents.

According to a Carnegie-Mellon study, operating irradiators just to treat meat and poultry (much less spices, wheat, and other foodstuffs) would be extremely risky, with a 99.7% chance of multiple major incidents at these facilities (a major incident is defined by the Nuclear Regulatory Commission (NRC) as "those that result in a release or spill of radioactive material, bodily harm, or a long term shut down of the facility").

The long term health effects of eating irradiated food are unknown. Irradiation reduces the vitamin content of food and creates new chemical substances called radiolytic products. Some of these substances are known carcinogens, like benzene, and others are completely new substances that have not been tested for toxicity.

In general, all foods should be labeled with information as to nature of ingredients,

places of origin, how they were processed, what non-food ingredients might be present. We citizens should be able with confidence to know what we are purchasing and consuming and to have the choice of alternative products. We should not have to depend only on information supplied by the corporations whose financial interests are served by misrepresentation.

We clearly have an issue of a consumer's being able to know what is in his food. Food labels rightly tell us what the fat, protein, carbohydrate, and vitamin content is in our food. We should be able to know whether our food has been treated with radiation. We should be able to choose whether to risk the danger or to choose an alternative product.

Therefore, I urge the labeling all foods containing irradiated ingredients. An easy to read statement should be placed on the package, close to the food name, and it should be accompanied by the international symbol. If the food is not packaged, this information should be displayed in plain view and obviously point toward the product that is displayed for sale. The label should be truthful and unambiguous, using terms that are clear, such as "treated by irradiation" and not such misleading terms as "pasteurized", "sanitized" or "sterilized".

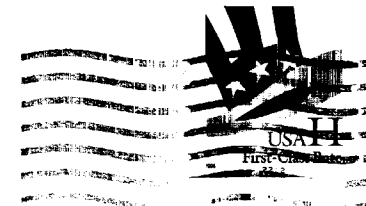
I urge, also, that you extend the comment period past May 18, so that more consumers have a chance to become informed and to comment.

Sincerely,

A handwritten signature in cursive script that reads "Margaret R. Hart".

Margaret R. Hart
aka (Mrs.) Margaret R. Collins

Margaret R. Collins
4034 S.W. Hamilton St.
Portland, OR 97221



Dockets Management Branch (HFA-305)
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, MD 20852

20852+0001

